



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

May 12, 2021

Via ECF

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Minh Quang Pham*  
S1 12 Cr. 423 (AJN)**

Dear Judge Nathan:

The parties jointly write to propose the following schedule for the filing of motions in this case, pursuant to the Court's direction at the defendant's arraignment on April 29, 2021: The defendant's motions shall be due on or before August 13, 2021; the Government's response shall be due on or before September 24, 2021; and the defendant's reply, if any, shall be due on or before October 1, 2021.

In light of the above, the parties also jointly request that the pretrial conference scheduled for May 26, 2021 be adjourned *sin die*. Counsel for the defendant consents to the exclusion of time under the Speedy Trial Act through August 13, 2021, to allow time for newly-appointed co-counsel to review discovery and meet with the defendant, and to file appropriate motions.

Respectfully submitted,

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Southern District of New York

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Cc: Defense Counsel (via email & ECF)